

EXHIBIT B

Declaration of Jay Herriman

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

**DECLARATION OF JAY HERRIMAN IN SUPPORT OF TWO HUNDRED SIXTY-
NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH
OF PUERTO RICO AND EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS
ASSERTING DUPLICATE LIABILITIES**

I, Jay Herriman, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am a Managing Director of Alvarez & Marsal North America, LLC (“A&M”). The Financial Oversight and Management Board (the “Oversight Board”) retained A&M to assist with, *inter alia*, the claims reconciliation process for the Debtors’ cases filed pursuant to the *Puerto*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

Rico Oversight, Management, and Economic Stability Act (“PROMESA”). Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. In my capacity as a Managing Director of A&M, I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors’ cases filed pursuant to PROMESA. The Debtors’ ongoing claims reconciliation process involves the collective effort of a team of A&M employees, as well as Proskauer Rose LLP and O’Neill & Borges LLC, counsel for the Oversight Board, the legal representative for the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”).

3. I submit this declaration in support of the *Two Hundred Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserting Duplicate Liabilities* (the “Two Hundred Sixty-Ninth Omnibus Objection”). I have personally reviewed the Two Hundred Sixty-Ninth Omnibus Objection and exhibits thereto and am, accordingly, familiar with the information contained therein.

4. In preparation for filing the Two Hundred Sixty-Ninth Omnibus Objection, and under my direction and/or supervision, each of the claims at issue in the Two Hundred Sixty-Ninth Omnibus Objection was carefully reviewed and analyzed in good faith using due diligence by the appropriate personnel. These efforts resulted in the identification of the claims to be disallowed, as identified in Exhibit A to the Two Hundred Sixty-Ninth Omnibus Objection.

5. To the best of my knowledge, information, and belief, the claims listed on Exhibit A to the Two Hundred Sixty-Ninth Omnibus Objection in the column titled “Claims to be Disallowed” assert the same liabilities, against the exact same Debtor, as the claims identified in

the column titled “Remaining Claims” (each a “Remaining Claim” and collectively the “Remaining Claims”). For example, the Claims to Be Disallowed were filed on behalf of the same creditor/claimant as the Remaining Claims, they set forth the same basis for the claim, they generally assert the same claim amount, and they generally attach the same supporting documentation, or the Remaining Claim attaches additional supporting documentation not provided with the Claim to Be Disallowed. Therefore, these claims are substantively duplicative because they assert a claim for the same purported liability, even though the Remaining Claims either include additional or different supporting documentation, assert a higher alleged claim amount, or are otherwise slightly different from the Claims to Be Disallowed. Because each of the Claims to Be Disallowed is duplicative of a Remaining Claim, the Debtors request that the duplicative claims be disallowed in their entirety to prevent multiple recoveries by the claimants.

6. Based on the foregoing, and to the best of my knowledge, information, and belief, the information contained in the Two Hundred Sixty-Ninth Omnibus Objection and exhibits thereto is true and correct, and the relief requested therein is in the best interests of the Debtors and their creditors.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 23, 2020

By: /s/ Jay Herriman
Jay Herriman

EXHIBIT C

Notice

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth and ERS.**

NOTICE OF THE TWO HUNDRED SIXTY-NINTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO
AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO CLAIMS ASSERTING DUPLICATE
LIABILITIES

IF YOUR CLAIM IS LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION, IT IS LISTED BECAUSE YOU HAVE ALSO FILED A DUPLICATE PROOF OF CLAIM FOR THE SAME ASSERTED LIABILITY. YOU DO NOT HAVE TO FILE A RESPONSE TO THE OMNIBUS OBJECTION IN ORDER TO PROTECT YOUR RIGHTS. YOUR DUPLICATE PROOF OF CLAIM WILL BE PRESERVED FOR DETERMINATION AT A LATER DATE AND YOU WILL RECEIVE NOTICE OF ANY FURTHER PROCEEDINGS.

PLEASE TAKE NOTICE THAT, on October 23, 2020, the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ filed the *Two Hundred Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserting Duplicate Liabilities* (the “Omnibus Objection”) with the United States District Court for the District of Puerto Rico (the “Court”).²

¹ PROMESA is codified at 48 U.S.C. §§ 2101-2241.

² Capitalized terms used but not defined herein shall have the meanings set forth in the Omnibus Objection.

OVERVIEW

- **PLEASE CHECK IF YOUR CLAIM(S) IS/ARE LISTED ON EXHIBIT A TO THE OMNIBUS OBJECTION.**
- **If your claim(s) is/are NOT listed on Exhibit A, your claim will not be affected by the Omnibus Objection, and you DO NOT have to do anything.**
- If your claim(s) is/are listed as “Claims to be Disallowed” on Exhibit A to the Omnibus Objection, the Debtors are seeking to disallow your initial claim(s) because your claim(s) assert the same liabilities as the claim(s) listed under “Remaining Claims” on Exhibit A to the Omnibus Objection.
- **The Omnibus Objection WILL NOT affect your claim(s) listed under “Remaining Claims” in Exhibit A to the Omnibus Objection (each a “Remaining Claim”). You will retain your Remaining Claim against the Commonwealth and/or ERS, as identified in Exhibit A to the Omnibus Objection.**
- THE OMNIBUS OBJECTION SEEKS TO ALTER YOUR RIGHTS AS TO ANY CLAIM LISTED IN THE COLUMN TITLED CLAIMS TO BE DISALLOWED. ANY CLAIM THAT IS DISALLOWED WILL BE TREATED AS THOUGH IT WERE NEVER FILED.
- YOU SHOULD READ THIS NOTICE AND THE OMNIBUS OBJECTION CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.
- Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>.
- **If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OMNIBUS OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

[Additional pages follow]

IMPORTANT NOTICE PURSUANT TO LOCAL RULE 3007-1

Any party against whom this Omnibus Objection has been served, or any other party to the action who objects to the relief sought herein, shall serve and file a response to the Omnibus Objection with the clerk's office of the United States District Court for the District of Puerto Rico by **4:00 p.m. (Atlantic Standard Time) on November 25, 2020** unless otherwise extended, in writing, by the Debtors. If no response is filed within the time allowed herein, the Omnibus Objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the Court may schedule a hearing.

Critical Information for Claimants Choosing to File a Response

Who is Required to File a Response. Any party who disputes the Omnibus Objection is required to file a response in accordance with the procedures set forth herein. If a party whose claim is subject to the Omnibus Objection does not file and serve a response in compliance with the procedures herein, the Court may grant the Omnibus Objection with respect to such claim without further notice to the claimant.

Who is NOT Required to File a Response. If you do not oppose the relief sought in the Omnibus Objection, then you do not need to file a written response to the Omnibus Objection and you do not need to appear at the hearing on the Omnibus Objection (described below). Additionally, the Omnibus Objection only applies to the claims listed on Exhibit A to the Omnibus Objection, a copy of which is available free online at <https://cases.primeclerk.com/puertorico>. **If your claim is not listed on Exhibit A to the Omnibus Objection, no response is required.**

Deadline for Filing a Response. Your response will be deemed timely **only if** it is filed with the Court **and** served by **4:00 p.m. (Atlantic Standard Time) on November 25, 2020**, unless otherwise extended, in writing, by the Debtors, or upon written request to the Court and order of the Court extending the deadline.

**The deadline for filing and serving a response is
4:00 p.m. (Atlantic Standard Time) on November 25, 2020.**

Hearing on the Omnibus Objection. If a response is properly filed and served in accordance with this notice, a hearing on the Omnibus Objection and the response will be held at **9:30 a.m. (Atlantic Standard Time) on December 9, 2020**, before The Honorable Laura Taylor Swain at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. If you file a response to the Omnibus Objection, then you should plan to appear at the hearing on the Omnibus Objection. The Debtors, however, reserve the right, on three (3) business days' notice, to adjourn the hearing with respect to the Omnibus Objection and the response.

The Debtors may file a reply to your response or reply in oral argument at the hearing. The Debtors are permitted to file their reply no later than seven (7) calendar days before the hearing on the Omnibus Objection and the response.

THE COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED AND SERVED BY THE RESPONSE DEADLINE IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS NOTICE.

What to File with a Response. Your response to the Omnibus Objection must contain the following information.

- (i) **Contact Information.** The response must include a **name, address, telephone number, and email address** of either (1) the responding claimant; (2) the claimant's attorney or designated representative to whom the attorneys for the Debtors should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant's behalf.
- (ii) **Caption.** The response must contain a caption stating the name of the Court, the names of the Debtors, the case number, the title of the Omnibus Objection to which the response is directed, and the proof of claim number(s) related thereto from Prime Clerk (which are listed on Exhibit A to the Omnibus Objection and available free online at <https://cases.primeclerk.com/puertorico>).
- (iii) **Reason(s) for Opposing the Omnibus Objection.** The response must contain a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection.
- (iv) **Supporting Documentation.** To the extent not already included with the proof of claim, the response should include a copy of any other documentation or other evidence of the claim, upon which the claimant will rely in opposing the Omnibus Objection; provided, however, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the response; and provided, further, that the claimant shall disclose to the Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its claim, subject to appropriate confidentiality constraints.
- (v) **Signature.** You must sign your response. If you do not sign your response, the clerk will not accept it for filing.

IMPORTANT NOTICE REGARDING SENSITIVE INFORMATION CONTAINED IN A RESPONSE.

All materials submitted to the Court in response to the Omnibus Objection may be publicly filed and accessible to any member of the public. Therefore, the response should **not include** sensitive documents or information, such as copies of driver's licenses, passports, birth certificates, Social Security cards, sensitive medical information or

confidential business information. Sensitive information submitted to the Court in response to the Omnibus Objection must adhere to the following guidelines:

- Social Security numbers and taxpayer identification numbers should be redacted (that is, blacked out), except for their last four digits.
- Birthdays should be redacted, except for the year of an individual's birth.
- The name of any individual known to be a minor should be redacted, except for that person's initials.
- Financial account numbers should be redacted, except for their last four digits.

Any such sensitive or confidential information upon which a claimant relies in support of its claim must be provided directly to counsel for the Debtors, and will be kept confidential. You may provide this information by mailing it to the following address:

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Where and How to File and Serve a Response. Every response should be filed electronically with the Court on the docket of *In re Commonwealth of Puerto Rico*, Case No. 17 BK 3283-LTS. There are two methods that you can use to file your response:

1. **Online.** Registered users of the Court's case filing system must file their response electronically in searchable portable document format.
2. **By Mail.** If you are not an attorney who is a registered user of the Court's case filing system, you may file and serve a response by mailing it to the Court's Clerk's office, the Oversight Board, and the Creditors' Committee at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Times Square
New York, New York 10036-8299
Attn: Martin J. Bienenstock
Brian S. Rosen

Counsel for the Creditors' Committee
Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
James Bliss
James Worthington
G. Alexander Bongartz

YOUR RESPONSE must be mailed so as to be received by the Clerk's Office, the Oversight Board, and the Creditors' Committee no later than **4:00 p.m. (Atlantic Standard Time)** on **November 25, 2020**, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline.

In the event that you are unable to file and serve a response online or by mail as specified above, you may file a response in person at the following address by no later than **4:00 p.m. (Atlantic Standard Time)** on **November 25, 2020**, unless otherwise extended by the Debtors, in writing, or upon a written request to the Court and order of the Court extending the deadline:

Clerk's Office
United States District Court
#150 Chardon Avenue
Federal Building
San Juan, Puerto Rico 00918

A certificate of service should be included with your response explaining how service was accomplished.

If you have any questions about filing and serving a response, including questions about the Court's case filing system, please contact the **Prime Clerk hotline** at **(844) 822-9231**.

Reservation of Rights. NOTHING IN THE OMNIBUS OBJECTION OR THIS NOTICE IS OR SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE COMMONWEALTH, COFINA, HTA, ERS, PREPA, PBA, OR ANY OTHER PARTY IN INTEREST IN THE TITLE III CASES TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, OR DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

[Additional pages follow]

Additional Resources and Who to Contact with Questions

All documents filed in the Title III Cases, including copies of claims filed using CM/ECF, are available free online at <https://cases.primeclerk.com/puertorico>. This website is maintained by Prime Clerk and includes a searchable database to assist with locating documents.

If you require additional information regarding the Omnibus Objection, the status of your response, your claim, or this notice, please contact the Prime Clerk hotline at **(844) 822-9231** (toll free for U.S. and Puerto Rico) or **(646) 486-7944** (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available). Inquiries may also be sent via email to puertoricoinfo@primeclerk.com.

ANEXO B

Declaración de Jay Herriman

**TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS
PARA EL DISTRITO DE PUERTO RICO**

In re:

JUNTA DE SUPERVISIÓN Y ADMINISTRACIÓN
FINANCIERA PARA PUERTO RICO,

como representante del

ESTADO LIBRE ASOCIADO DE PUERTO RICO *et al.*,

Deudores.¹

PROMESA

Título III

Núm. 17 BK 3283-LTS

(Administrado Conjuntamente)

**La presente radicación guarda
relación con el ELA y el SRE.**

**DECLARACIÓN DE JAY HERRIMAN EN APOYO DE LA DUCENTÉSIMA
SEXAGÉSIMA NOVENA OBJECCIÓN GLOBAL (NO SUSTANTIVA) DEL ESTADO
LIBRE ASOCIADO DE PUERTO RICO Y DEL SISTEMA DE RETIRO DE LOS
EMPLEADOS DEL GOBIERNO DEL ESTADO LIBRE ASOCIADO DE PUERTO RICO
A RECLAMACIONES EN LAS QUE SE ALEGAN RESPONSABILIDADES
DUPLICADAS**

Yo, Jay Herriman, de conformidad con el Título 28 U.S.C., § 1746, por medio de la presente declaro, so pena de incurrir en falso testimonio, que lo que sigue es veraz y correcto a mi fiel saber y entender:

¹ Los Deudores en los presentes Casos de Título III, junto con el respectivo número de caso de Título III y los últimos cuatro (4) dígitos del número de identificación contributiva federal de cada Deudor, en su caso, son i) el Estado Libre Asociado de Puerto Rico (el "ELA") (Caso de Quiebra Núm. 17 BK 3283-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 3481); ii) la Corporación del Fondo de Interés Apremiante de Puerto Rico ("COFINA") (Caso de Quiebra Núm. 17 BK 3284-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 8474); iii) la Autoridad de Carreteras y Transportación de Puerto Rico (la "ACT") (Caso de Quiebra Núm. 17 BK 3567-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 3808); iv) el Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico (el "SRE") (Caso de Quiebra Núm. 17 BK 3566-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 9686); v) la Autoridad de Energía Eléctrica de Puerto Rico (la "AEE") (Caso de Quiebra Núm. 17 BK 4780-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 3747); y vi) la Autoridad de Edificios Públicos de Puerto Rico (la "AEP", y denominados conjuntamente con el ELA, COFINA, la ACT, el SRE y la AEE, los "Deudores") (Caso de Quiebra Núm. 19-BK-5523-LTS) (Últimos cuatro dígitos de la identificación contributiva federal: 3801) (Los números de los casos de Título III están enumerados como números de Casos de Quiebra debido a ciertas limitaciones en el programa informático)

1. Soy director general de Alvarez & Marsal North America, LLC ("A&M"). La Junta de Supervisión y Administración Financiera (la "Junta de Supervisión") contrató a A&M para que le ayudara, entre otras cosas, con el proceso de reconciliación de reclamaciones en relación con los casos de los Deudores radicados conforme a la *Ley para la Supervisión, Administración y Estabilidad Económica de Puerto Rico* ("PROMESA"). Salvo disposición en contrario en la presente declaración, tengo conocimiento personal de los hechos aquí expuestos.

2. En mi capacidad de director general de A&M, soy una de las personas responsables de supervisar el proceso de reconciliación y objeciones relativo a las reclamaciones en el marco de los casos de los Deudores radicados conforme a PROMESA. El proceso continuo de reconciliación de reclamaciones de los Deudores implica un esfuerzo colectivo de un equipo de los empleados de A&M, así como de Proskauer Rose LLP y de O'Neill & Borges LLC, abogados de la Junta de Supervisión, el representante legal del Estado Libre Asociado de Puerto Rico (el "ELA") y del Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico (el "SRE", y junto con el ELA, los "Deudores").

3. Realizo esta declaración en apoyo de la *Ducentésima sexagésima novena objeción global (no sustantiva) del Estado Libre Asociado de Puerto Rico y del Sistema de Retiro de los Empleados del Gobierno del estado Libre Asociado de Puerto Rico a Reclamaciones en las que se alegan responsabilidades duplicadas* (la "Ducentésima sexagésima novena objeción global"). He revisado personalmente la Ducentésima sexagésima novena objeción global, y los anexos relativos a la misma, por lo que estoy familiarizado con la información que contienen.

4. Durante el proceso de preparación para radicar la Ducentésima sexagésima novena objeción global, bajo mi dirección y/o supervisión, cada una de las reclamaciones controvertidas en la Ducentésima sexagésima novena objeción global fue examinada y analizada cuidadosamente

de buena fe aplicando la debida diligencia por parte del personal pertinente. Dichos esfuerzos resultaron en la identificación de las reclamaciones que han de ser rechazadas, según se identifica en el Anexo A de la Ducentésima sexagésima novena objeción global.

5. A mi fiel saber y entender, las reclamaciones identificadas en el Anexo A de la Ducentésima sexagésima novena objeción global en la columna titulada "Reclamaciones que han de ser rechazadas" alegan las mismas responsabilidades contra exactamente los mismos Deudores que las reclamaciones identificadas en la columna titulada "Reclamaciones Restantes" (cada una denominada una "Reclamación Restante" y conjuntamente, las "Reclamaciones Restantes"). Por ejemplo, las Reclamaciones que han de ser rechazadas fueron radicadas en nombre del mismo acreedor/reclamante que en el caso de las Reclamaciones Restantes, dichas reclamaciones establecen los mismos fundamentos de la reclamación, por lo general reclaman exactamente el mismo monto y generalmente adjuntan la misma documentación justificativa, o la Reclamación Restante adjunta documentación justificativa adicional que no se ha proporcionado con la Reclamación que ha de ser rechazada. En consecuencia, dichas reclamaciones están sustancialmente duplicadas, puesto que reclaman la misma supuesta responsabilidad, aunque las Reclamaciones Restantes incluyen documentación justificativa adicional o diferente, reclaman un monto mayor relativo a presunta reclamación o bien son ligeramente diferentes en otros aspectos de las Reclamaciones que han de ser rechazadas. Puesto que cada Reclamación que ha de ser rechazada está duplicada con respecto a una Reclamación Restante, los Deudores solicitan que las reclamaciones duplicadas sean rechazadas en su totalidad para evitar recuperaciones múltiples por parte de los reclamantes.

6. Sobre la base de lo que antecede, y a mi fiel saber y entender, la información contenida en la Ducentésima sexagésima novena objeción global y en sus anexos es veraz y

correcta, y el remedio allí solicitado redundará en el mejor interés de los Deudores y de sus acreedores.

7. Declaro, so pena de incurrir en falso testimonio conforme a las leyes de los Estados Unidos de América, que lo que antecede es veraz y correcto a mi fiel saber y entender.

Fecha: 23 de octubre de 2020

Por: [Firma en la versión en inglés]
Jay Herriman